

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

**TO: Clem Trischler, Esq.
Pietragallo Gordon Alfano Bosick & Raspanti, LLP
One Oxford Centre
Pittsburgh, PA 15219**

Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of Eric Sheinin, on February 25, 2022, at 9:00 a.m. Eastern time, and continuing until completion, at 12621 Native Dancer Place, North Potomac, Maryland, 20878, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 9, 2021

PLAINTIFFS' PEC COUNSEL

By: /s/John R. Davis
JOHN R. DAVIS
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6001 Bold Ruler Way, Ste 100
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EXHIBIT A

DOCUMENT REQUESTS

- 1) Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Mr. Sheinin's report, and preparation for deposition or trial.
- 2) Any notes, i.e. written or electronic, reflecting consulting or litigation work that has not been documented in invoices.
- 3) Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored by Mr. Sheinin with regard to USP monographs.
- 4) Any articles, presentations, seminars, classes or other similar documents (including PowerPoint-type slides) authored by Mr. Sheinin and any aspect of FDA regulatory compliance for pharmaceutical drugs, including but not limited to CGMP compliance.
- 5) Copies of any documents or articles relied upon for the opinions set forth in the report served, if not listed in the report.
- 6) Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.
- 7) Copies of all Publications and Presentations listed in Mr. Sheinin's CV, which is Exhibit A to his Expert Report.
- 8) Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Mr. Sheinin in connection with a Daubert hearing or trial testimony in this litigation.

9) Documentation of any prior work Mr. Sheinin has done as a consultant for any of the Defendants in this action.

10) Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness.

11) Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness.

12) Any textbook referenced by the witness in forming his opinions.

13) Copies of all transcripts of testimony under oath given by Mr. Sheinin in the last 10 years.

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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' PEC COUNSEL

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